



555 California Street
12th Floor
San Francisco, CA 94104

415.875.2300
Fenwick.com

Jedediah Wakefield
jwakefield@fenwick.com | 415.875.2331

July 23, 2025

Honorable Edgardo Ramos
United States District Court
40 Foley Square, Courtroom 619
New York, NY 10007

Re: *Kandeh v. Nordvpn S.A. et al.*, Case No. 1:25-cv-02571-ER

Dear Judge Ramos:

In accordance with Rule 1(E) of the Court's Individual Practices, Defendants Nordvpn S.A., Tefincom S.A., and NordSec B.V. write with Plaintiff Lanzy Kandeh's consent to request that the Court adjourn the July 25, 2025, pre-motion conference concerning Defendants' anticipated motion to dismiss and stay proceedings in this case. The parties have entered mediation in hopes of resolving this case and other cases pending against Defendants. The parties held their first mediation session on July 15, 2025, and have scheduled a follow-up mediation session for September 2, 2025. Given the potential resolution of this matter, the parties seek an adjournment until after the mediation in the interest of judicial economy.

This is Defendants' first request to adjourn the pre-motion conference and stay proceedings, and there are no other scheduled dates that will be affected if this request is granted.

Thank you for considering this request.

Sincerely,

FENWICK & WEST LLP

s/ Jedediah Wakefield

Jedediah Wakefield

MEMO ENDORSED

The proceedings are stayed. The parties are directed to report to the Court as soon as the meditation process is concluded.

SO ORDERED.

Edgardo Ramos, U.S.D.J.
Dated: July 24, 2025
New York, New York